

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

**NATIONAL RIFLE ASSOCIATION OF  
AMERICA,**

**Plaintiff,**

V.

**ANDREW CUOMO, both individually and  
in his official capacity; MARIA T. VULLO,  
both individually and in her official capacity;  
and THE NEW YORK STATE  
DEPARTMENT OF FINANCIAL  
SERVICES,**

## **Defendants.**

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**CIVIL CASE NO. 18-CV-00566-TJM-CFH**

**NOTICE OF MOTION BY PLAINTIFF  
FOR LEAVE TO FILE SECOND  
AMENDED COMPLAINT AND JURY  
DEMAND**

PLEASE TAKE NOTICE that pursuant to Rules 15(a) and 16(b) of the Federal Rules of Civil Procedure and upon the annexed proposed Second Amended Complaint and redline version showing changes from the First Amended Complaint, the accompanying memorandum of law, and all other papers and proceedings in this matter, Plaintiff National Rifle Association of America (the “NRA”), by their undersigned counsel of record, will move this Court before the Honorable Christian F. Hummel, in the United States District Court, Northern District of New York, Albany, New York, on a date to be designated by the Court, for an order granting leave to file its Second Amended Complaint and Jury Demand.

The parties held a court conference with Magistrate Judge Hummel regarding the proposed motion on December 4, 2019.

Dated: December 20, 2019

Respectfully submitted,

By: /s/ William A. Brewer III  
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**ATTORNEYS FOR THE NATIONAL  
RIFLE ASSOCIATION OF AMERICA**